REMARKS

I. The Status of All Claims

Claims 1-13 are pending. Claims 1, 6, and 11-13 are independent claims. Claims 2-5 depend from claim 1, and claim 7-10 depend from claim 6.

Claims 1, 2, 4, 6, 7, and 10 are currently amended. Claims 11-13 are new. New claims 11-13, and the changes to claims 1, 2, 4, 6, 7, and 10, are fully supported by the specification and claims as originally filed. Therefore, no new matter has been added.

II. The Rejection of Claims 10 Under 35 USC 112, Second Paragraph

Claim 10 has been amended to further clarify the claimed invention. Therefore, the applicant respectfully submits that the rejection of claim 10 under 35 USC 112, second paragraph, should be withdrawn.

III. The Rejections of Claims 1-3, 5-8, and 10 Under 35 USC 102(b) as Anticipated by United States Patent 5,521,902 to Ferguson ("Ferguson")

A. Independent Claim 1

1. Claim 1 - "...a loop link..."

a. The Recitation of "...a loop link..."

Claim 1 recites that:

> "...at least one of said links that is returned in a *loop from a signalling point to the signalling point as a loop link*, different signalling network identities being allocated to the loop link at an output and input side by the signalling system." [Emphasis added.]

b. The Applicant's Definition of "...a loop link..."

The applicant's specification discloses at page 3 line 30 to page 4 line 10 that:

> For example, *6 networks are established in the system and cyclically connected to one another by network tunnels.* Two networks (networks 2 and 3 here) are also connected to a protocol test device that emulates a point code (X and Y here) in each of the two networks. All networks employ the same NI.
>
> These routing tables in the networks in the system are configured such that network 3 routes MSUs that contain a destination point code PC=X to network 4, and network 4 routes them farther to network 5, etc. The routing tables are analogously configured in the opposite direction for PC=Y. A message generated by the test device is thus routed through the system six times, as a result whereof high system loads can be generated with relatively simple test devices. Further variation of this application are the incorporation of the users (for example, ISUP) or, on the other

hand, *completely closed loops wherein MSUs constantly circulate.* [Specification page 3 line 30 to page 4 line 10; emphasis added.]

2. **Ferguson Does Not Disclose "...a loop link..."**

Ferguson does disclose or suggest "...a loop link..." as recited in claim 1 and defined by the applicant's specification. Therefore Fergerson does not anticipate or render obvious the subject matter of claim 1. Therefore, the rejection of claim 1 is improper and should be withdrawn.

3. **Claim 1 - "...different signalling network identities...allocated to the loop link at an input and output side..."**

a. **The Recitation of "...different signalling network identities..."**

Claim 1 recites that:

"...at least one of said links that is returned in a loop from a signalling point to the signalling point as a loop link, *different signalling network identities being allocated to the loop link at an output and input side* by the signalling system." [Emphasis added.]

b. **The Applicant's Definition of "...different signalling network identities..."**

The applicant's specification discloses, for example, at page 2 lines 4-19 that:

...Since a signalling link normally belongs to only one network, however, the perception has prevailed that *allocating individual links to specific networks suffices for distinguishing the network.* The NI is thus no longer required as a distinguishing feature.

In fact, there are communication systems that support more than four signalling networks (for example, 8 or 32), for example the EWSD system of Siemens AG, or such systems are being planned. A *network identity is thereby internally allocated to each signalling link* and an NI is externally allocated to each internal network identity. *Networks with different internal identity* can thereby definitely use the same external NI. *Each (internal) network is thereby completely separated from the other networks.* This concept, what is referred to as the *multiple network concept, is then employed for operating loops in ZGS7* without requiring additional development. The signalling system in a signalling point is identified in two (internal) networks by different point codes. These two networks can then be unproblematically connected to one another by signalling links. [Specification page 2 lines 4-19; emphasis added.]

The applicant's specification further discloses, for example, at page 3 lines 1-11 that:

...[the] arrangement is referred to below as [a] *network* or, respectively, *signalling tunnel*. Embodiments of the invention are explained in greater detail below.

Figure 1 shows an embodiment of the invention for the interworking in a signalling point. *An ISUP is located both in the internal network 1 as well as 2.* Externally, the two networks use the same NTI but *different point codes.* A call between R1 and R2 is routed via the *ISUP loop*. It suffices for this purpose to correspondingly configure the ZGS7 *routing tables in both networks* as well as the routing tables for the call processing (R1 and R2 in ISUP) and to accomplish [sic] the necessary trunks and *signalling tunnels for the ISUP loop.* [Specification page 2 lines 4-19; emphasis added.]

2. **Ferguson Does Not Disclose "....different signalling network identities...allocated to the loop link at an input and output side..."**

Ferguson does disclose or suggest "...different signalling network identities...allocated to the loop link at an input and output side..." as recited in claim 1 and defined by the applicant's specification. Therefore Fergerson does not anticipate or render obvious the subject matter of claim 1. Therefore, the rejection of claim 1 is improper and should be withdrawn.

B. **Claims 2-5 - Dependency On An Allowable Claim**

Claims 2-5 depend directly from claim 1. Therefore, dependent claims 2-5 patentably distinguish over Ferguson for at least the reasons given above for independent claim1. Therefore, the rejections of claims 2-5 are improper and should be withdrawn.

C. **Independent Claim 6**

Claim 6 recites:

...*allocating different signalling network identities at an output and input side* to a link as *a loop link* that is returned from the signalling apparatus to the same signalling apparatus in a loop. [Emphasis added.]

Therefore, independent claim 6 patentably distinguishes over Ferguson for at least the reasons given above for independent claim 1. Therefore, the rejection of claim 6 is improper and should be withdrawn.

D. **Claims 7-10 - Dependency On An Allowable Claim**

Claims 7-10 depend directly from claim 6. Therefore, dependent claims 7-10 patentably distinguish over Ferguson for at least the reasons given above for independent claim 6. Therefore, the rejections of claims 7-10 are improper and should be withdrawn.

IV. **The Rejections of Claims 4 and 9 Under 35 USC 103 as Obvious Over Ferguson in View of United States Patent 6,286,011 to Velamuri et al. ("Velamuri")**

A. **Dependency On Allowable Claims**

Dependent claims 4 and 9 depend from independent claims 1 and 6, respectively. Therefore, dependent claims 4 and 6 patentably distinguish over Ferguson for at least the reasons given above for independent claims 1 and 6. Therefore, the rejections of claims 4 and 9 are improper and should be withdrawn.

B. **No Prima Facie Rejection**

a. **No Motivation or Suggestion to Combine Teachings**

The rejections of claims 4 and 9 under 35 USC 103 does not state a motivation or suggestion to combine the teachings of Ferguson with the teachings of Velamuri. Therefore, there is no proper *prima facie* rejection of claims 4 and 9. Therefore, the rejections of claims 4 and 9 are improper and should be withdrawn.

b. **Ferguson in Combination With Velamuri Does Not Disclose a "...loop link..."**

Claims 4 and 9 recite "...a loop link..." Neither Ferguson nor Velamuri teach or suggest a "...a loop link..." recited in claims 4 and 9 and defined by the applicant's specification. Therefore Fergerson in combination with Velamuri do not teach or suggest the subject matter of claims 4 and 9. Therefore, there is no proper *prima facie* rejection of claims 4 and 9. Therefore, the rejections of claims 4 and 9 are improper and should be withdrawn.

V. **Closure**

Should the examiner have any questions, he is urged to contact the undersigned at 703-415-0012.

Respectfully Submitted,

Siemens Aktiengesellschaft

1/20/2004
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Printed: January 20, 2004 (12:16pm)
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